

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Former Kaiser Smelter - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region X

**Subject:** POLREP #2  
Field Operations - Week 2  
Former Kaiser Smelter  
10RK00  
Mead, WA  
Latitude: 47.7525257 Longitude: -117.3777283

**To:** David Rees, EPA Region 10  
Wally Moon, EPA Region 10  
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**From:** Brooks Stanfield, On Scene Coordinator

**Date:** 8/11/2020

**Reporting Period:** 8/3/2020 - 8/8/2020

1. Introduction

1.1 Background

<b>Site Number:</b>	10RK00	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	6/1/2020
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	7/27/2020	<b>Start Date:</b>	7/27/2020
<b>Demob Date:</b>	12/31/2020	<b>Completion Date:</b>	12/31/2020
<b>CERCLIS ID:</b>	WAN001020091	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	WA (Washington)
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

See PolRep #1 for Background

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

See POLREP #1 for background narrative.

2.1.2 Response Actions to Date

Removal Activities:

EPA mobilized additional staff and equipment to the site to assist in removal operations, including a second On-Scene Coordinator (OSC), additional Superfund Technical Assessment & Response Team (START) and additional Emergency & Rapid Response Services (ERRS) contractors to the Site the week August 3rd, 2020 to expand removal operations on the facility parcel that are estimated to require four to six months to complete.

DECISION UNIT 1: ROBERTSON SIDING REMOVAL

EPA and its contractors continued removing panels of Robertson Siding on Building 34. An additional and larger excavator with long reach capabilities was mobilized to access panels of Robertson Siding out of reach of the excavator already on site. Dust suppression activities continued with "monsoon misters" mounted on equipment with high reach capabilities along with large diameter water hoses supplied by water trucks and portable water trailers. Clean up of contaminated debris in around the storm drains along the south of Building 34 was conducted. New filter socks were installed in these storm drains to prevent additional contaminated debris from entering the storm water collection and conveyance system.

DECISION UNIT 2: TSI PIPE INSULATION REMOVAL

No activities to date.

DECISION UNIT 3: WASTE PILE REMOVAL

No activities to date.

Health & Safety

Air sampling and perimeter monitoring procedures continued to ensure asbestos abatement and other cleanup activities comply with Occupational Safety and Health Act (OSHA), the National Emission Standards for Hazardous Air Pollutants (NESHAP), and the Washington Administrative Code as it pertains to air pollution sources such as fugitive dust. Initial data indicate that the operation is staying well below all action levels for air pollutants. Sampling and monitoring for asbestos and dust emissions will continue through Week 3.

As the asbestos abatement work scaled up in Week 2, a decontamination trailer was brought on Site to

assist with decontamination of abatement workers as they enter and exit the Exclusion Zone.

An internal Health and Safety Audit was conducted by a Certified Industrial Hygienist. The audit focused on safety practices taken to comply with requirements related to COVID-19 as well as asbestos abatement activities. The internal audit found that compliance with COVID-19 procedures, such as practicing social distancing and wearing face coverings, was "impressive". Work Area safety was also deemed to be appropriate for a site such as this with a note made that typical asbestos removal doesn't include the additional safety hazards that this site has such as open pits and unsecured overhead hazards. EPA is planning a follow-up safety evaluation in the coming weeks that will include a greater focus on physical safety hazards.

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

On August 6, 2020 an Agreed Settlement and Administrative Order on Consent (ASAOC) was signed between EPA and Kaiser Aluminum Investments Company (KAIC) to remove approximately 5,000 cubic yards of contaminated sediment and over 400,000 gallons of contaminated water from the settling ponds on KAIC property, address contamination in the existing stormwater collection and aqueduct conveyance system, and reconstruct the settling ponds and aqueduct conveyance system and restoration to functional status as part of the ongoing stormwater management system.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
PCBs & ACM	Siding (Sq Ft)	70,440	N/A		43.34 tons

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### DECISION UNIT 1: ROBERTSON SIDING REMOVAL

During the Week 3, the crew will continue the siding removal process on the north side of Building 34. Additional buildings for Robertson siding will be identified for initiation of siding removal operations.

Locate engineering diagrams of the Ore Bridge within the Site Archives Building 38.

#### DECISION UNIT 2: TSI PIPE INSULATION REMOVAL

No activities anticipated.

#### DECISION UNIT 3: WASTE PILE REMOVAL

No activities anticipated.

#### Data Management

Continue VIPER connections on monitoring equipment to provide remote viewing of real-time air monitoring readings of particulate matter.

Continue development of GIS viewer and data dashboard to provide an up-to-date view of project progress for internal and external audiences.

Support Washington Department of Ecology in gathering photo and video documentation of site status using an Unmanned Aircraft System (UAS).

#### KAIC Pond & Stormwater Conveyance System Cleanup

Hold kick-off meeting with KAIC Project Coordinators to establish timeline of deliverables and expectations of upcoming field operations to complete cleanup of settling ponds and stormwater conveyance system.

### 2.2.1.1 Planned Response Activities

Siding Removal, Building 34, preparing Removal on an additional building(s).

### 2.2.1.2 Next Steps

Continued refinement of removal approach. Generate updated understanding of production rate and associated costs to refined project cost projections.

### 2.2.2 Issues

Safety issues related to heat stress, physical and chemical hazards, and COVID-19 are a continued focus for the team. EPA has assigned a second OSC specifically to assume duties of Site Safety Officer to monitor compliance with the site specific Health & Safety Plan and support the workers address any unanticipated challenges.

## 2.3 Logistics Section

EPA's command post is scheduled be connected to the power grid to reduce costs and reduce carbon emissions from operation of a diesel-powered generator. Shoreline power will further reduce the carbon emissions from the operation by enabling the team to recharge Lithium-Ion power stations overnight, which can be used in place of gasoline-powered generators to power sampling pumps in the field.

## 2.4 Finance Section

### 2.4.1 Narrative

As the the removal approach continues to be refined over the next two weeks, the team will begin to refine cost projections based on the rate of production.

The OSC continues to work with EPA finance staff to update financial needs and strategies for the completion of Decision Units 2 and 3.

\*ERRS costs reported below do not include an additional \$2,239,585 in pending costs.

**Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$5,179,428.57	\$126,205.59	\$5,053,222.98	97.56%
START	\$648,514.35	\$92,683.00	\$555,831.35	85.71%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$5,827,942.92	\$218,888.59	\$5,609,054.33	96.24%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

**2.5 Other Command Staff****2.5.1 Safety Officer**

Eric Nuchims - EPA

Valeria Cramer - START

**2.5.2 Liaison Officer****2.5.3 Information Officer**

Bill Dunbar - EPA Region 10

**3. Participating Entities****3.1 Unified Command**

N/A

**3.2 Cooperating Agencies**

Washington Department of Ecology

Spokane Regional Clean Air Agency

Spokane County Health District

**4. Personnel On Site**

EPA - 2

START - 3

ERRS - 21

**5. Definition of Terms**

No information available at this time.

**6. Additional sources of information****6.1 Internet location of additional information/report**

<https://www.kxly.com/epa-to-begin-removing-asbestos-pcbs-at-former-kaizer-aluminum-smelter-site/>

<https://www.spokesman.com/stories/2020/jul/28/epa-says-it-will-start-asbestos-pcb-cleanup-of-for/>

<https://m.facebook.com/eparegion10/>

**6.2 Reporting Schedule**

Initial reporting schedule will be done weekly for the first 3-4 weeks. Reporting is expected to transition to a schedule of every 14 days beginning in late-August or early-September

Project updates are being made posted by EPA's PIO regularly to the Notices section of the project website: [https://response.epa.gov/site/bulletins\\_list.aspx?site\\_id=14546](https://response.epa.gov/site/bulletins_list.aspx?site_id=14546)

These updates are viewable by the general public.

**7. Situational Reference Materials**

No information available at this time.